

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MEGAN RAFFERTY, DEBORAH
HAYNES, LEASON JACOB, and DIANA
GRAY, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

ROBERT DOAR, in his capacity as its
Commissioner of the New York City Human
Resources Administration;

KRISTIN PROUD, in her capacity as
Commissioner of the New York State Office
of Temporary and Disability Assistance;

NIRAV SHAH, M.D., in his capacity as its
Commissioner of the New York State
Department of Health;

the NEW YORK CITY HUMAN
RESOURCES ADMINISTRATION;

the NEW YORK STATE OFFICE OF
TEMPORARY AND DISABILITY
ASSISTANCE; and

the NEW YORK STATE DEPARTMENT
OF HEALTH,

Defendants.

No. 13-CV-1410 (TPG)

**ORDER PURSUANT TO
FED. R. CIV. P. 23(e)**

WHEREAS, this action was brought as a class action pursuant to Federal Rule of Civil
Procedure 23;

WHEREAS, on August 7, 2013, this Court certified a class pursuant to Federal Rule of Civil Procedure 23 and appointed the National Center for Law and Economic Justice and Drinker Biddle & Reath LLP as class counsel;

WHEREAS, counsel for Plaintiffs and counsel for Defendants have entered into a Stipulation and Order of Settlement (“Settlement”) that, if approved by the Court, would resolve Plaintiffs’ claims; and

WHEREAS, counsel for the parties have jointly moved the Court, pursuant to Federal Rule of Civil Procedure 23(e)(1), for preliminary approval of the proposed Settlement, for a hearing thereon, and for authorization of notice of the hearing to be provided to members of the Plaintiff class;

NOW, THEREFORE, IT IS ORDERED THAT:

1. A hearing pursuant to Rule 23(e) of the Federal Rules of Civil Procedure shall be held before the undersigned on _____, for purposes of determining whether the proposed Settlement is fair, reasonable, and adequate, and should be approved by the Court. The hearing shall take place before the Honorable Thomas P. Griesa, U. S. District Court, Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 26B, New York, NY 10007-1312, and will begin at _____. The hearing may be adjourned or continued from time to time without further notice.

2. The Notice of Proposed Class Action Settlement (“Notice”) attached hereto as Exhibit “1” is hereby approved.

3. At least thirty (30) days prior to the hearing, Defendant Proud, as succeeded by Defendant Sam Roberts, shall cause the New York State Office of Temporary and Disability Assistance (“OTDA”) to: (a) post the Notice in English and Spanish in the client waiting areas at

OTDA's Boerum Place, Brooklyn, New York fair hearing center, with the Notice posted in these locations being 8.5" x 11" or larger in size, using 18-point font; and (b) publish the Notice in English and Spanish on its web site, in 18-point font and audio format, at <http://otda.ny.gov/>.

4. At least thirty (30) days prior to the hearing, Defendant Shah, as succeeded by Defendant Howard Zucker, shall cause the New York State Department of Health ("DOH") to: publish the Notice in English and Spanish on its web site, in 18-point font and audio format, at <https://www.health.ny.gov/>.

5. At least thirty (30) days prior to the hearing, Defendant Doar, as succeeded by Defendant Steven Banks, shall cause the New York City Human Resources Administration ("HRA") to: (a) post the Notice in English and Spanish in the public client waiting areas at all SNAP and Medicaid offices, with the Notice posted in these locations being 8.5" x 11" or larger in size, using 18-point font; (b) publish the Notice on its web site, at <http://www.nyc.gov/html/hra/html/home/home.shtml>, in English and Spanish in 18-point font, and in audio format (accessible through a link and/or by downloading an audio file); and (c) mail the Notice in English and Spanish, as appropriate, to all Class Members it has individually identified.

6. At least forty (40) days prior to the hearing, HRA will provide Plaintiffs' counsel with:

- (a) a PDF of the Notice in English and in Spanish in 18-point font;
- (b) ten (10) copies of the Notice in Audio Format (in English); and
- (c) twenty (20) copies of the Notice in Braille (in English),

which Plaintiffs' counsel National Center for Law and Economic Justice and Drinker Biddle & Reath LLP will make available to members of the class upon request.

7. At least thirty (30) days prior to the hearing, Plaintiffs' counsel National Center for Law and Economic Justice and Drinker Biddle & Reath LLP will: (a) include a link to the Notice in English and Spanish on their respective web sites, in 18-point font and in audio format (accessible through a link and/or by downloading an audio file).at, respectively, <http://nclej.org/> and <http://www.drinkerbiddle.com/rafferty>; (b) mail or email the Notice to the disability rights and legal aid organizations identified in Exhibits 2 and 3 respectively, asking these entities to post the Notice on their websites and distribute the Notice to their members; and (c) furnish the Notice to the disability rights and legal aid organizations identified in Exhibits 2 and 3 respectively, in 18-point font, Audio Format and Braille, upon request.

8. The disability rights organizations identified in Exhibit 2, attached hereto, are focused, in whole or in part, on advocacy issues on behalf of persons in New York City who are blind and seriously visually impaired.

9. The legal aid organizations identified in Exhibit 3, attached hereto, provide legal representation to low-income individuals, including persons in New York City who are blind and seriously visually impaired.

10. Any member of the Plaintiff class may appear at the aforesaid hearing on _____ at _____, in person or by counsel, and object to the Settlement or give reasons why they believe that the proposed settlement should not be approved as fair, reasonable, and adequate.

11. Any member of the Plaintiff class may also object to or comment on the Settlement by submitting objections in writing. Objections or comments must be received by the Court at the address listed above, no later than five (5) days before the date of the scheduled hearing.

Dated: _____
New York, New York

Thomas P. Griesa
United States District Court Judge